

**EXCEPTION 108**  
BellSouth Florida OSS Testing Evaluation

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Date: August 31, 2001

**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

**Exception:**

KPMG Consulting has not received timely responses for the pre-order queries Appointment Availability (AAQ), Address Validation (AVQ), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Telecommunications Access Gateway (TAG). (TVV2)

**Background:**

According to Operations Support Systems OSS-1 of the Service Quality Measurement Plan<sup>1</sup>, BellSouth should return pre-order responses within an average interval that is at parity +2 seconds with retail performance provided monthly by BellSouth. KPMG Consulting used BellSouth parity metrics for the report period of June 1, 2001 through June 30, 2001<sup>2</sup>.

**Issue:**

During volume testing conducted on August 16, KPMG Consulting received the following results for AAQ, AVQ, SAQ and TNAQ pre-orders:

	95.88%	1.09%	99.01%	33.8 Seconds
	98.24%	.64%	99.39%	0.69 Seconds
	89.19%	6.97%	93.03%	2490.5 Seconds
	96.16%	.71%	99.33%	1.04 Seconds
	0%	100%	0%	15.8 Seconds
	77.21%	4.92%	95.47%	2.09 Seconds

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<sup>1</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved by Florida PSC June 12, 2001

<sup>2</sup> Pre-Ordering and Ordering OSS

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	93.46%	1.94%	98.06%	76.3 Seconds
	95.50%	2.22%	97.85%	3.12 Seconds

**Impact:**

Delays in receiving pre-order responses could prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC could decrease.

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**Date:** September 6, 2001

**EXCEPTION REPORT**

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 110.

**Exception:**

**KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). (PMR5)**

**Background:**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.<sup>1</sup> BellSouth provides CLEC Aggregate processed data<sup>2</sup> (PMAP raw data<sup>3</sup>) as needed to KPMG Consulting.

**Issue:**

KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: Acknowledgement Message Timeliness" SQM. The discrepancies are listed in the following table.

1	EDI	0-<=10	74883	74496
2	EDI	>10-<=20	5902	6206
3	EDI	>20-<=30	6799	5751
4	EDI	0-<=30	87584	86453

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<sup>1</sup>These reports are posted on the PMAP Web site.

<sup>2</sup> The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

<sup>3</sup> The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the July 25, 2001 version 2.1.0.6 of the Manual.

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5	EDI	>30-<=45	7731	8514
6	EDI	>45-<=60	326	674

KPMG Consulting reviewed BellSouth's Response to Observation 110.<sup>4</sup> BellSouth's Response to Observation 110 stated that:

*The calculation of the interval buckets for Acknowledgement Message Timeliness as reported by KPMG failed to match BellSouth calculations because values are being placed into the incorrect buckets. The reports and the SQM bucket designation are correct (0-<=10, etc), however the code is incorrect (0-<10, etc), as illustrated in the chart below. TeamConnection feature 2225 has been entered to correct this issue.*

Based on BellSouth's response, which states that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalates Observation 110 to Exception status.

**Impact:**

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Ordering: Acknowledgement Message Timeliness" SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

<sup>4</sup> Florida OSS BellSouth's Response to Observation 110, 8/28/01.

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Date: September 28, 2001

**EXCEPTION**

KPMG Consulting has identified an Exception as a result of the Work Center Support Evaluation (PPR-8).

**Exception:**

**BellSouth does not have adequate guidelines for call tracking and resolution at its Local Carrier Service Center (LCSC). (PPR8)**

**Background:**

Competitive Local Exchange Carriers (CLECs) may encounter various issues during the ordering process. In order to support CLECs, BellSouth has established a customer support center, the Fleming Island LCSC, in Jacksonville, FL.

Resale and UNE calls from Atlanta LCSC customers and Resale calls from Birmingham LCSC customers are automatically routed to the Fleming Island call center for assistance by dedicated call center representatives. UNE calls from Birmingham LCSC customers and all Complex services calls are handled at the respective LCSC ordering centers.

During interviews<sup>1</sup> conducted at BellSouth's LCSC call center in Jacksonville and ordering centers in Birmingham and Atlanta, KPMG Consulting was informed that Service Representatives are required to record details for each incoming call on a form titled 'Call Analysis Sheet'. The notes screen in BellSouth's Service Order Confirmation System (SOCS) is updated only when work is conducted on a particular PON. KPMG Consulting obtained copies of the call analysis sheets and verified that it contains adequate fields for capturing call details.

**Issue:**

BellSouth's LCSC call handling procedures do not adequately facilitate issue tracking and resolution.

The information contained in the "Call Analysis Sheet" is not readily available to other call center representatives when a CLEC calls to follow up on an issue. Some call details

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<sup>1</sup> Fleming Island call center in Jacksonville FL on March 5, 2001 and in Orange Park, FL on August 1, 2001. Atlanta LCSC interviews on; September 20, 2000, February 12, 2001, July 20, 2001 and August 28, 2001. Birmingham LCSC interview on February 05, 2001.

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are recorded in SOCS if the previous call resulted in a change to a particular PON, however there is no requirement in SOCS to capture the extensive details available in the Call Analysis Sheet. BellSouth does not have a process to ensure that all service representatives who answer the phones can use previous call details for reference as necessary.

**Impact:**

Without a process to ensure that CLEC call details are available to all employees who provide customer service, BellSouth may not provide dependable and consistent assistance in support of their business requirements. This might hinder CLECs' ability to submit orders and deliver service to their customers in a timely manner.

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Date: October 1, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

#### Exception:

**BellSouth's policy of retaining Resale call detail for thirty (30) days after the bill period date is inadequate for bill reconciliation and claims investigation. (TVV11)**

#### Background:

Wholesale bills are sent to CLECs within ten business days of the bill period date. CLECs must mail or fax billing claims to BellSouth's Billing Help Desk for investigation. Investigations of claims are generally completed in thirty days from the date of receipt of the claim.

#### Issue:

BellSouth's policy for retaining Resale call detail for thirty business days, allows at best a maximum of twelve business days for a CLEC to detect a problem, file a claim, and have BellSouth investigate the claim before the usage call detail is lost.

KPMG Consulting has identified inconsistencies in BellSouth's record retention policies including:

- BellSouth's documentation for billing claims states that "Generally, the dispute process takes thirty days from the date of receipt to complete".<sup>1</sup> Based upon the experience of KPMG Consulting, CLEC claims may be denied due to the absence of call details which might substantiate claims of this type.
- BellSouth's documentation for the retention of DUF records states: "The ODUF [Optional Daily Usage File] are available for 90 days in the EMI format".<sup>2</sup> The retention of the daily usage detail is more robust than the retention of call detail for calls which are billed on Resale invoices.

#### Impact:

Current BellSouth policy inhibits a CLEC's ability from initiating claims due to the abbreviated timeframe in which such claims can be investigated and resolved. The policy

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<sup>1</sup> BellSouth CLEC Billing Guide (8/29/2001), Chapter 2, Section 5 (Dispute Resolution)

<sup>2</sup> BellSouth CLEC Billing Guide (8/29/2001), Chapter 4, Section 3 (Optional Daily Usage File)

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places an undue burden on CLECs to identify a usage billing problem, perform any necessary research (tariffs, etc.) to verify the problem, and file a claim in a timeframe that would allow BellSouth to investigate the claim.



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Date: October 1, 2001

**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the testing activities associated with Provisioning Verification and Validation (TVV-4).

**Exception:**

**BellSouth's systems or representatives have not consistently provisioned service and features as specified in orders submitted by KPMG Consulting. (TVV4)**

**Background:**

As part of its Operational Support System (OSS) testing efforts in Florida, KPMG Consulting has been conducting a Customer Service Record (CSR) Validation test to ensure that the information contained in the CSR is correctly updated and consistent with the Local Service Request (LSR). KPMG Consulting compared the post-activity CSR with the LSR and/or pre-activity CSR.

KPMG Consulting expects the information on the post-activity CSR to be consistent with

- updated information in the LSR and,
- information contained in the pre-activity CSR for items where the LSR did not specify updates.

**Issue:**

KPMG Consulting applies a success standard of 95%<sup>1</sup> when testing BellSouth's ability to correctly update CSRs. KPMG Consulting has reviewed 190 CSRs. CSRs for 87 telephone numbers were not consistent with the information in the pre-activity CSR or the LSR submitted to BellSouth. Based on these initial findings, BellSouth has updated 54% of the analyzed CSRs accurately. KPMG Consulting has found the following discrepancies:

**Issue 1: Directory listing section of the post-CSR did not accurately reflect information contained in the pre-CSR or changes specified in the DL form of the LSR.**

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<sup>1</sup> KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BLS guidelines.

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1a	015011FLRN100016	00	9990	The DL section of the LSR specified a Listing Type of 1, which specifies a listed number. However the post-CSR identifies the number as a non-pub. A listed LAL was also specified by the LSR, but the post-CSR does not show an auxiliary listing.
1b	075021FPTF102010	03	9990	The DL form specified a LNLN of Resident and a LNFN of Rcm for the listing that was changed. However, the post-CSR has a LN of R*C*M

**Issue 2:** Location did not update in the post-CSR as specified in the EU section of the LSR.

2a	012011FPTN000005	00	9993	The LSR specified 9776 as the End User room, but the LOC field in the post-CSR has 9881 as the room.
2b	012011FPLN000010	00	9993	The LSR specified 9600 as the End User room, but the LOC field in the post-CSR has 9982 as the room.
2c	057021FPMC000004	00	9990	The LSR specifies the end user floor as 99 and the end user room as 9761, but the post-CSR populates the LOC section with DES (4 <sup>TH</sup> FLR BELLSOUTH CO).

**Issue 3:** Listed number is the previous ATN, which was disconnected, and the disconnected lines are still listed in the hunt group on the post-CSR.

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3a	018042FPTN000008	01	9993	The order was issued to disconnect the existing ATN and 1 auxiliary line of a 5 line resale customer, and it completed on 5/2. The post-CSR shows 9545222037 (existing ATN that was disconnected) as an account number. The TN 9545222037 was removed from the S&E section, but it was not removed from the hunt group. The LSR also specifies that 9545222183 is to be disconnected and removed from the hunt group. This line is no longer present in S&E section of the post-CSR, but it is still listed as a member of the hunt group.
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**Issue 4:** BTN on the LSR is different than the BAN1 on the post-CSR.

4a	019011FPEN100005	00	8772	The BAN1 specified in the LSR is 904N250168168, but the BTN on the post-CSR is 904Q932812212.
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**Issue 5:** Disconnected line has incorrect call transfer information on the post-CSR.

	PON	VER	CC	Result
5a	018051FPRJ000022	00	9993	The LSR specifies that calls are to be transferred from 9043549746 to 9033548705, but the post-CSR has calls transferred from 9043548705 to 9033548705.

**Issue 6:** Hunt groups were not updated as specified by the LSR.

6a	002141FPEJ001001	00	9990	The LSR specified the addition of sequential hunting for 5615140316 & 5615140322, but the hunt group did not appear on the post-activity CSR.
6b	013021FPEN000003	00	9993	The LSR specified the addition of 9545223720 & 9544679084 to the existing hunt group, but the post-activity CSR did not list the lines as part of the hunt group. However, the lines are listed in the S&E section of the post-CSR.

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6c	018011FPTN003006	00	9993	The LSR specified that 9545228153 & 9545228797 were to be disconnected and removed from the hunt group. These lines are no longer present in the S&E section of the post-CSR, but they are still listed as members of the hunt group.
6d	018011FPTN002007	00	9993	The LSR specified that 9545222644 & 9545225471 were to be disconnected and removed from the hunt group. These lines are no longer present in the S&E section of the post-CSR, but they are still listed as members of the hunt group.
6e	018011FPLN000012	00	9993	The LSR specified that 8504339771 & 8504339774 were to be disconnected and removed from the hunt group. These lines are no longer present in the S&E section of the post-CSR, but they are still listed as members of the hunt group.

**Issue 7:** The location did not update in the post-CSR as specified in the EU section of the LSR, and the hunt groups were not updated as specified by the LSR.

7a	012051FPEJ100004	00	9993	The LSR specifies the end user floor as 89 and the end user room as 8902, but the post-CSR populates the floor as 99 and the room as 9877. The LSR specified sequential hunting for 3055774534, but this line was not a member of the hunt group on the post-CSR.
7b	012051FPEJ000005	00	9993	The LSR specifies the end user floor as 89 and the end user room as 8908, but the post-CSR populates the floor as 99 and the room as 9879. The LSR specified sequential hunting for 8502363886, but this line was not a member of the hunt group on the post-CSR.
7c	012051FPTJ001008	00	9993	The LSR specifies the end user floor as 89 and the end user room as 8910, but the post-CSR populates the floor as 99 and the room as 9878. The LSR specified sequential hunting for 8502306338, but this line was not a member of the hunt group on the post-CSR.

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**Issue 8:** Chargeable listings in the S&E section of the post-CSR changed.

8a	011071FPEJ005003	00	9993	Chargeable listing USOC changed from CLT (business additional listing) to FLT (listing no rate).
8b	011071FPTJ000015	00	9993	Chargeable listing USOC changed from CLT (business additional listing) to FLT (listing no rate).

**Issue 9:** There are features or services in the S&E section of the post-activity CSR that were neither specified in the LSR nor appeared in the pre-activity CSR. The CLEC contact information on the post-activity CSR is incorrect.

9a	010161FPTN101009	00	9993	The LSR specified a FPI code of E on the RS form, but the post-CSR displayed PCA BO instead of PCA OF (freeze PIC). The reseller contact name (RESCN) did not update in the post-CSR as specified in the LSR.
9b	010161FPTN100011	00	9993	The LSR specified a FPI code of E on the RS form, but the post-CSR displayed PCA BO instead of PCA OF (freeze PIC). The reseller contact name (RESCN) did not update in the post-CSR as specified in the LSR.

**Issue 10:** Features or services listed in the S&E section of the post-activity CSR differ from those specified in the pre-activity CSR or LSR.

10a	001121FPEN100002	00	9990	The LSR specifies W as an ACT code. Two additional USOC codes were added to the S&E section of the LSR that were not present on the pre-activity CSR. The USOC codes are NW102 and ADL11.
10b	002191FPEN100002	00	9990	Three way calling (ESC) was specified in the LSR as a new feature for 9045980680, but the feature was not present on the post-CSR.
10c	002191FPEN100007	00	9990	Three way calling (ESC) was specified as a new feature, but the feature was not present on the post-CSR.

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10d	010111FPLN100010	00	9993	The LSR specified a FPI code of E on the RS form, but the LPIC was frozen instead. Call Waiting (ESX) was listed as a feature in the post-CSR, but it was not specified in the LSR.
10e	012031FPEJ003004	03	9993	The LSR specified the addition of features with USOC codes of HBY and NSD for 8502304972 & 8502304967, but neither were found on the post-CSR.
10f	012041FPEJ001001	00	9993	The post-CSR lists UEPRC (USOC if caller id is a feature) instead of the UEPRL (USOC if caller id is not a feature) USOC listed on the LSR. UEPVF is present on the post-CSR even though no features are specified on the post-CSR.
10g	035071FPMC000007	00	9990	The LSR specifies a W activity type, but USOC codes differ between the pre and post-CSRs. The FUJMX USOC appeared on the pre-CSR but not on the post-CSR. A PR7BV & CTG (CLS 80.DCAD.508422.023.SB) as well as a PR7EX & CTG (CLS 80.DZZD.508422.001.SB) were found on the post-CSR and not on the pre-CSR.

**Issue 11:** The post-CSR CLEC contact in the S&E section differs from the Initiator Identification and Initiator telephone number specified in the LSR.

11a	001081FPLN000008	00	9990	The CLEC contact (UNECN) on the S&E section of the post-activity CSR lists the implementation contact instead of the initiator.
11b	010032FPLN100021	00	9993	The reseller contact name (RESCN) did not update in the post-CSR as specified in the LSR.
11c	010032FPLN100022	00	9993	The reseller contact name (RESCN) did not update in the post-CSR as specified in the LSR.
11d	011071FPEJ002004	01	9993	The CLEC contact name (UNECN) did not update in the post-CSR as specified in the LSR.

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11e	012031FPRJ000017	00	9993	The CLEC contact (UNECN) on the S&E section of the post-activity CSR lists the implementation contact instead of the initiator.
11f	058022FPMC000002	00	9993	The reseller contact name (RESCN) did not update in the post-CSR as specified in the LSR.

**Issue 12:** The CLEC Contact Name (UNECN) in the S&E section of the post-CSR is spelled incorrectly.

12a	011071FPEJ001007	02	9993	The LSR specified L Mireles, but the post-CSR listed L Mereles.
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**Issue 13:** The information in the DL section of the post-CSR is different than the information contained in the pre-CSR or LSR.

13a	070011FP1H002011	00	9990	The DL section of the post-CSR differs from the pre-CSR and even the information contained in the EU section of the LSR. The LN section of the post-CSR has CKS; BELLSOUTH FLA as the name, and the LA section has 2660 NW 137 <sup>th</sup> ST. The pre-CSR and EU section of the LSR list the name as Richcom located at 2660 E Superior Street. The SIC code changed from 7999 to 8711 even though a DL form was not submitted.
13b	070011FPLH000020	04	9990	The LN section of the post-CSR has CKS; BELLSOUTH FLA whereas the end user name on the LSR is Richcom. Richcom is also the name listed on the pre-CSR. The SIC code changed from 7999 to 8711 even though a DL form was not submitted.
13c	072011FPTH100026	00	9990	The LN section of the post-CSR has CKS; BELLSOUTH FLA whereas the end user name on the LSR is Richcom.
13d	072011FPTH100034	00	9990	The LN section of the post-CSR has CKS; BELLSOUTH FLA whereas the end user name on the LSR is Flo South.
13e	080021FPTH000008	00	9990	The LN section of the post-CSR has CKS;

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				BELLSOUTH FLA whereas the end user name on the LSR is Richcom.
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**Issue 14:** The information in the DL section of the post-CSR is different than the information contained in the pre-CSR or LSR. The CLEC contact is also incorrect. The BAN1 on the LSR does not equal the BTN on the post-CSR.

14a	072011FPTH100022	00	9990	The LN section of the post-CSR for the loop service order (072011FPTH100022) has CKS; BELLSOUTH FLA as the name. The EU section of the LSR lists the name as Flo South.
14b	072011FPTF100022	00	9990	The BTN (305Q855482482) on the post-CSR for the DL record update (072011FPTF100022) differs from the BAN1 on the LSR (305Q850860860).

**Issue 15:** The information in the DEL field of the DIR section of the post-CSR is different than the information contained in the pre-CSR or LSR.

15a	001051FPEJ100008	00	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15b	001051FPEJ100011	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15c	001051FPEJ100015	00	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15d	001051FPTJ100023	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15e	001051FPTJ102027	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15f	001051FPRJ100033	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15g	001052FPTJ100009	00	9990	The DEL field on the pre-CSR is A0 whereas it is A5 on the post-CSR.
15h	001061FPEJ102005	00	9990	The DEL field on the pre-CSR is A0, B0, C0 whereas it is A1, B1, C1 on the post-CSR.
15h	001061FPEJ100007	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1, C1 on the post-CSR.
15i	001061FPRJ101029	00	9990	The DEL field on the pre-CSR is A0



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				whereas it is A1 on the post-CSR.
15j	001161FPEN100005	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A0, B0, C0 on the post-CSR.
15k	001161FPRN100017	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A0, B0, C0 on the post-CSR.
15l	002081FPEJ100013	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A2, B2 on the post-CSR.
15m	002081FPEJ100014	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A2, B2 on the post-CSR.
15n	002081FPTJ000024	00	9990	The DEL field on the pre-CSR is A0 whereas it is A2 on the post-CSR.
15o	002081FPTJ100026	00	9990	The DEL field on the pre-CSR is A0 whereas it is A2 on the post-CSR.
15p	002081FPTJ101028	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A2, B2 on the post-CSR.
15q	002121FPEJ100003	00	9990	The DEL field on the pre-CSR is A0, B0, C0 whereas it is A1, B1, C1 on the post- CSR.
15r	002121FPEJ100007	00	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15s	002131FPEJ100007	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A2, B2 on the post-CSR.
15t	002151FPEJ100001	01	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A0, B0, C0 on the post-CSR.
15u	002151FPEJ100003	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1, C1 on the post-CSR.
15v	002151FPEJ100005	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15w	002151FPTJ101010	00	9990	The DEL field on the pre-CSR is A0, B0, C0 whereas it is A1, B1, C1 on the post- CSR.
15x	002201FPEJ101005	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A4, B4 on the post-CSR.
15y	002211FPTJ102009	03	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1, C1 on the post-CSR.
15z	002211FPTJ100014	00	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15aa	006031FPEJ002001	00	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15ab	006031FPEJ000006	00	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15ac	006031FPTJ000020	00	9990	The DEL field on the pre-CSR is A0, B0,

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				C0 whereas it is A1, B1, C1 on the post-CSR.
15ad	007011FPEN000002	00	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15ac	007011FPEN000006	00	9990	The DEL field on the pre-CSR is A0, B0, C0 whereas it is A1, B1, C1 on the post-CSR.
15ad	007011FPTN003007	03	9994	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15ae	007011FPTN000008	01	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15af	007061FPEJ103008	00	9991	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15ag	007061FPTJ105013	02	9990	The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.
15ah	007061FPTJ102014	01	9990	The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
15ai	011121FPRN100009	00	9993	The DEL field on the pre-CSR is A0, B0 whereas it is A0, B0, C0 on the post-CSR.
15aj	054031FPEN001005	01	9993	The DEL field on the pre-CSR is A0, B0 whereas it is A0, B0, C0 on the post-CSR.

**Issue 16:** Features or services listed in the S&E section of the post-activity CSR differ from those specified in the pre-activity CSR or LSR. The information in the DEL field of the DIR section of the post-CSR is different than the information contained in the pre-CSR or LSR.

16a	001061FPEJ100006	00	9990	The LSR specified V for both the ACT and LNA, but features were present on the post-CSR that were not specified on the LSR. DRS, ESX, NSS were present in the S&E section of the post-activity CSR even though they were not specified. The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1, C1 on the post-CSR.
16b	002151FPTJ100012	00	9990	The LPIC on the post-CSR for 8502345781 was none while the LSR specifies 5124. The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
16c	002201FPEJ100008	01	9990	Caller ID Deluxe was specified in the LSR as

## EXCEPTION 112

### BellSouth Florida OSS Testing Evaluation

				a new feature for 9545221354, but this feature was not present on the post-CSR. The DEL field on the pre-CSR is A0, B0 whereas it is A4, B4 on the post-CSR.
16d	002211FPEJ100001	01	9990	The LSR specified the addition and deletion of features, but the post-CSR did not update accordingly. Call return (NSS) and Area Plus (VR5) were supposed to be added while Ringmaster (DRS) was to be deleted, but this did not occur. The DEL field on the pre-CSR is A0 whereas it is A1 on the post-CSR.
16e	019031FPEJ000004	00	3840	The LSR specifies an activity type of W, but the pre-CSR S&E section had the LNPCX USOC while the post-CSR did not contain this USOC. The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.

**Issue 17:** The BTN in the BILL section on the post-CSR does not match the Billing Account Number (BAN1) on the LSR. There are services and features in the S&E section of the post-CSR that were neither specified in the LSR nor were they present on the pre-activity CSR. The information in the DEL field of the DIR section of the post-CSR is different than the information contained in the pre-CSR or LSR.

17a	001161FPRN100018	00	9990	The BAN1 on the LSR is 561Q855134134 whereas the BTN on the post-CSR is 561Q857170170. The NPU USOC on the pre-activity CSR was changed to the NP3 USOC on the post-activity CSR. The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1, C1 on the post-CSR.
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**Issue 18:** The directory listing section of the post-CSR did not accurately reflect information contained in the pre-CSR or changes specified in the DL form of the LSR. The information in the DEL field of the DIR section of the post-CSR is different than the information contained in the pre-CSR or LSR.

18a	007032FPTJ000004	04	9990	The DL section of the LSR specified a Listing Type of 1, which specifies a listed number. However the post-CSR identifies the number
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**EXCEPTION 112**  
BellSouth Florida OSS Testing Evaluation

				as a non-pub. The DEL field on the pre-CSR is A0, B0 whereas it is A1, B1 on the post-CSR.

**Impact:**

BellSouth's inability to accurately update the information in the customer service records may result in a decrease in customer satisfaction. The mishandling of customer requests will negatively impact a customer's view of a CLEC's service quality.

## EXCEPTION 113

### BellSouth Florida OSS Testing Evaluation

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Date: October 4, 2001

#### EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

#### Exception:

KPMG Consulting has found that BellSouth does not capture xDSL transactions, which are processed through Corporate Order Gateway (COG), for the "Ordering: Percent Flow-Through Service Requests (Summary)" and "Ordering: Percent Flow-Through Service Requests (Detail)" Service Quality Measurements (SQMs). (PMR4).

#### Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

#### Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is evaluating the completeness of data from source systems to the point where SQM values are calculated. During the course of its investigation, KPMG Consulting found that BellSouth does not capture xDSL transactions, which are processed through COG, for its flow-through metrics.

#### Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth does not capture all relevant data, BellSouth's SQM reports for the "Ordering: Percent Flow-Through Service Requests (Summary)" and "Ordering: Percent Flow-Through Service Requests (Detail)" SQMs may be incomplete. Without complete and accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

**EXCEPTION 114****BellSouth Florida OSS Testing Evaluation**

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Date: October 5, 2001

**EXCEPTION REPORT**

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

**Exception:**

**BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).**

**Background:**

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

**Issue:**

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that was used for the calculation of the "Ordering: FOC Timeliness (Non-Trunks)" SQM for fully mechanized and partially mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM.

The excluded records were orders that had actually received a FOC (Firm Order Confirmation) and should have been included in the data set used to calculate the "Ordering: FOC Timeliness (Non-Trunks)" SQM for fully and partially mechanized records. The following table identifies the SQM report and the PMAP Raw Data tables (June 2001) affected:

1	Ordering: FOC Timeliness (Non-Trunks)-fully	Ordering: FOC Timeliness	6084

## AMENDED OBSERVATION 45

### BellSouth Florida OSS Testing Evaluation

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Date: July XX, 2001

#### OBSERVATION REPORT

**An observation has been identified as a result of test activities associated with the Provisioning Verification and Validation test (TVV4).**

#### Observation:

BellSouth returned Firm Order Commitment (FOC) Frame Due Times that do not match the regular hours for provisioning. (TVV4)

#### Background:

**BellSouth Business Rules for Local Ordering<sup>1</sup> defines the desired frame cut-over time and indicates that the time will reflect the local time of the end user's location(s). Furthermore, the BellSouth Standard Interconnection Agreement states the following:**

**"For the purposes of this Agreement, BellSouth's regular working hours for provisioning are defined as follows:**

- Monday-Friday – 8:00am – 5:00pm (Excluding Holidays, Resale/UNE non-coordinated, coordinated orders and order coordinated-time specific)**
- Saturday – 8:00am – 5:00pm (Excluding Holidays) (Resale/UNE non-coordinated orders)"<sup>2</sup>**

When the ILEC performs a coordinated conversion (Hot Cut) the customer's service will be disrupted for a short period of time. To minimize the affect of this outage, a CLEC will submit an LSR for a time-specific coordinated conversion. BellSouth business rules for local ordering<sup>3</sup> allow the CLEC to insert a DFDT (Desired Frame Due Time). The CLEC negotiates this time frame with their customer. The CLEC expects that the Firm Order Confirmation (FOC) response from the ILEC will acknowledge the Desired Frame Due Time. At a minimum the time should be within the regular working hours as indicated in the interconnection agreement outlined above.

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<sup>1</sup> BellSouth Business Rules for Local Ordering<sup>1</sup> – OSS99 – CGLEOO-009, Issue 9K, December 22, 2000, Section 28.2.2.17 DFDT – Desired Frame Due Time.

<sup>2</sup> BST Website – [http://www.interconnection.bellsouth.com/become\\_clec/be\\_clec\\_ics\\_agree.html](http://www.interconnection.bellsouth.com/become_clec/be_clec_ics_agree.html), attachment 6, section 1.3

<sup>3</sup> BellSouth Business Rules for Local Ordering – OSS99, CGLEOO, Issue 9K, December 22, 2000, Section 28.2.2.17.

## AMENDED OBSERVATION 45

### BellSouth Florida OSS Testing Evaluation

**KPMG Consulting has observed 65 orders and of those 23% of the FOCs returned with an FDT of 9PM, which is outside BellSouth normal hours of operation. The orders are listed in the table below.**

Order ID	Order Number	Quantity	Area	Start Time	End Time	Notes
1	ZXMIAY0005201	1	7125	9:00	900P	12/02/00
2	ZXMIAY0005210	1	7125	10:00	900P	12/02/00
3	ZXMIAY00055193	1	7125	11:00	900P	PON not found
4	ZXMIAY0005192	1	7125	13:00	900P	12/02/00
5	ZXMIAY0005191	1	7125	15:00	900P	12/02/00
6	ZXMIAY0005203A	1	7125	15:00	900P	12/02/00
7	ZXMIAY0005359	1	7125	8:00	900P	12/04/00
8	ZXMIAY0005324	1	7125	9:00	900P	12/04/00
9	ZXMIAY0005354	1	7125	9:00	900P	12/04/00
10	ZXMIAY0005331	1	7125	10:00	900P	12/04/00
11	ZXMIAY0005363	1	7125	10:00	900P	12/04/00
12	ZXMIAY00053336A	1	7125	14:00	900P	PON not found
13	ZXMIAY0005327A	1	7125	15:00	900P	12/04/00
14	ZXMIAYB0001451	1	7125	14:00	900P	04/13/00
15	ZXMIAY0005321	1	7125	16:00	900P	12/04/00

#### Question:

**The Frame Due Time on the FOC is outside the hours of operation stated in the standard interconnect agreements. How should CLECs interpret this response?**

#### BellSouth Response

On 12/10/00, BellSouth implemented a software change per change request CR0091. CR0091 was submitted to the Change Control Process (CCP) by a CLEC. The CLEC requested BellSouth's Local Number Portability (LNP) interface begin returning the



**AMENDED OBSERVATION 64**  
**BellSouth Florida OSS Testing Evaluation**

Date: May 1, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV1).

**Observation:**

**KPMG Consulting has not received responses to several Local Service Requests (LSRs) submitted via the Telecommunications Access Gateway (TAG) interface. (TVV1)**

**Background:**

CLEC's send service requests to BellSouth via TAG. In response to a service request submitted via TAG, BellSouth first sends an Acknowledgment and then a subsequent response of an Error/Reject/Clarification or a Firm Order Confirmation.

BellSouth automatically transmits an acknowledgement when a CLEC's service request registers in BellSouth's database. Furthermore, 97% of fully mechanized service requests should receive a reject within 1 hour, and 85% of non-mechanized or partially mechanized service requests should receive a reject within 24 hours of submission.<sup>1</sup> 95% of mechanized Firm Order Confirmations are expected within 3 hours, and 85% of non-mechanized and partially mechanized Firm Order Confirmations are expected in less than 36 hours.<sup>2</sup>

The following PONs submitted using the TAG interface have received Acknowledgments but have not received a subsequent response from BellSouth.

001061FPTJ101017	01	9991	3/26/01
001161FPTN100011	00	9990	4/2/01
002121FPTJ100013	00	9990	4/3/01

<sup>1</sup> See BellSouth OSS Testing Florida Interim Performance Metrics, October 2000, O-Pg. 12.

<sup>2</sup> See BellSouth OSS Testing Florida Interim Performance Metrics, October 2000, O-Pg. 14.



**AMENDED OBSERVATION 64**  
BellSouth Florida OSS Testing Evaluation

002121FPTJ100014	00	9990	4/3/01
002121FPTJ100015	00	9990	4/3/01
002191FPTN100011	00	9990	4/2/01
002191FPTN100012	00	9990	4/4/01
002201FPTJ102011	03	9990	4/2/01
010061FPTJ101010	01	9993	4/3/01
010151FPTJ100022	01	9993	4/4/01
017011FPTN101014	00	9993	4/2/01
020021FPTN102010	00	9991	3/22/01
072011FPTF101027	00	9990	4/3/01
074041FPTH001004	00	9993	4/2/01
076011FPTH100006	00	9993	4/4/01
076011FPTH100007	00	9993	4/4/01

**Question:**

Can BellSouth please clarify why KPMG Consulting has not received responses for these orders?

**OBSERVATION 68**  
BellSouth Florida OSS Testing Evaluation

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Date: May 11, 2001

**OBSERVATION REPORT**

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5).

**Observation:**

KPMG Consulting cannot replicate the values for the "Ordering: Percent Flow Through Service Requests (Detail)" Service Quality Measurement (SQM) report for the CLEC Aggregate (November 2000). (PMR5)

**Background:**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data<sup>1</sup> (PMAP raw data<sup>2</sup>) used to create these reports.<sup>3</sup>

**Issue:**

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: Percent Flow-through Service Requests (Detail)" SQM. The discrepancy is listed in the following table.

1	Auto Clarification	CLEC aggregate	40824	41568

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<sup>1</sup> The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

<sup>2</sup> The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

<sup>3</sup> These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

**OBSERVATION 68**  
BellSouth Florida OSS Testing Evaluation

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**Question:**

KPMG Consulting requires clarification of the calculation of "Auto Clarification" since other report values for this SQM are derived from the "Auto Clarification" value.

## **OBSERVATION 69**

**BellSouth Florida OSS Testing Evaluation**

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**Date:** May 14, 2001

### **OBSERVATION REPORT**

An observation has been identified as a result of the test activities associated with the Metrics Definitions and Standards Development and Documentation Verification & Validation Review. (PMR2)

#### **Observation:**

The formulas specified in the SQM document for calculating the SQMs listed below are inconsistent with the benchmarks ordered by the Florida Public Service Commission: (PMR2)

- **Ordering: Reject Interval**
- **Ordering: Firm Order Confirmation Timeliness**
- **Provisioning: Coordinated Customer Conversions Interval**
- **Change Management: Average Delay Days for Change Management Notices**
- **Change Management: Average Delay Days for Documentation**

#### **Background:**

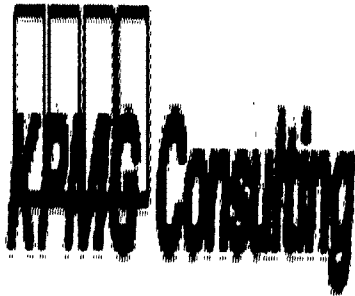
Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission (FPSC), BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

#### **Issue:**

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is assessing the consistency between the documented formulas for calculating SQMs and FPSC-ordered benchmarks.

KPMG Consulting's analysis of the documented calculation formulas and FPSC -ordered benchmarks for the aforementioned SQMs found that there are inconsistencies between the benchmarks and the documented formulas for calculating the SQMs.

In each of the SQMs listed above, the documented formula requires the calculation of a mean, whereas the FPSC-ordered benchmark specifies the target level of service to be measured as a percentage attained within a specified time interval.



## OBSERVATION 69

### BellSouth Florida OSS Testing Evaluation

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#### Impact:

CLECs and regulators rely on BellSouth's metric reports to gauge the level of service provided by BellSouth. When metric values are not reported in a manner that is consistent with FPSC-ordered benchmarks, it is difficult to gauge BellSouth's performance.

# BELLSOUTH OSS Testing

## Florida Interim Performance Metrics

### O-6: Reject Interval

#### Definition

Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete.

#### Exclusions

- Service Requests canceled by CLEC prior to being rejected/clarified.
- Designated Holidays are excluded from the interval calculation.
- The following hours for Non-mechanized LSRs are excluded from the interval calculation<sup>1</sup>:
  - Residence Resale Group - from 7:00 PM Saturday until 7:00 AM Monday.
  - Business Resale, Complex, UNE Groups - from 6:00 PM Friday until 8:00 AM Monday.

Note<sup>1</sup>: The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted Hours of Operation. If a Non-Mechanized LSR is Rejected on Saturday by the Resale Business, UNE or Complex Group, the interval from 6:00 PM Friday until 8:00 AM Saturday will be excluded. If an LSR is rejected on Sunday by the LCSC Resale Residence Group, the interval from 7:00 PM Saturday until 8:00 AM Sunday will be excluded. For LSRs rejected by the Resale Business, UNE and Complex Groups on Sunday, the interval from 6:00 PM Friday until 8:00 AM Sunday will be excluded.

#### Business Rules

**Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp of reject in LEO). Auto Clarifications are considered in the Fully Mechanized category.

**Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LEO.

**Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.

**Non-Mechanized:** The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via LON.

**Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

#### Calculation

**Reject Interval** =  $\Sigma[(\text{Date and Time of Service Request Rejection}) - (\text{Date and Time of Service Request Receipt})] / (\text{Number of Service Requests Rejected in Reporting Period})$

**Reject Interval Distribution** =  $(\text{Service Requests Rejected in Interval} / \text{Total Service Requests Rejected in the Reporting Period}) \times 100$

#### Report Structure

- CLEC Specific
- CLEC Aggregate
- State, Region
- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized, Trunks
- Mechanized:
  - 0 - < 4 minutes
  - 4 - < 8 minutes
  - 8 - < 12 minutes
  - 12 - < 60 minutes
  - 0 - < 1 hour
  - 1 - < 8 hours
  - 8 - < 24 hours
  - >24 hours

# BELLSOUTH OSS Testing

## Florida Interim Performance Metrics

O-6: Reject Interval

- Non-mechanized:

- 0 - < 1 hour
- 1 - < 4 hours
- 4 - < 8 hours
- 8 - < 12 hours
- 12 - < 16 hours
- 16 - < 20 hours
- 20 - < 24 hours
- > 24 hours.

- Trunks:

- < 5 days
- > 5-8 days
- > 8-12 days
- >12-14 days
- >14-17 days
- >17-20 days
- >20 days

Average Interval for mechanized reports in hours, non-mechanized and Trunk reports in days.

### Level of Disaggregation

#### Product Reporting Levels

- Resale - Residence
- Resale - Business
- Resale - Design (Special)
- UNE Design
- UNE Non-Design
- UNE Loop with and w/o NP
- Interconnection Trunks
  - <10 Circuits/Lines
  - >10 Circuits/Lines

### Data Retained

Relating to CLEC Experience	Relating to BST Performance
<ul style="list-style-type: none"><li>• Report month</li><li>• Reject Interval</li><li>• Total Number of LSRs</li><li>• Total number of Rejects</li><li>• State and Region</li><li>• Total Number of ASRs (Trunks)</li></ul>	

### Retail Analog/Benchmark

- Benchmark: Mechanized 97%  $\leq$  1 hour
- Non-Mechanized and Partially Mechanized 85% < 24 hours
- Local Interconnection Trunks 85% within 4 days

Note: KPMG during Phase II will conduct a special study of end-to-end timing of order rejections (from initial receipt of the order by BST to the transmission of the rejection to the ALEC) in order to assess whether the definition of interval used in this metric is appropriate. This study will determine the transit times between the ALEC interface and the BST legacy systems. Loop qualification and loop make-up queries are not automated functions for BST. Therefore, these are not included in this metric. However, KPMG will make a special study of the timing of these queries relative to BST Retail operations.



# BELLSOUTH OSS Testing

## Florida Interim Performance Metrics

### O-7: Firm Order Confirmation Timeliness

#### Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of valid LSR to distribution of a Firm Order Confirmation.

#### Exclusions

- Rejected LSRs
- Designated Holidays are excluded from the interval calculation.
- The following hours for Non-mechanized LSRs are excluded from the interval calculation<sup>1</sup>:
  - Residence Resale Group - from 7:00 PM Saturday until 7:00 AM Monday.
  - Business Resale, Complex, UNE Groups - from 6:00 PM Friday until 8:00 AM Monday.

**Note<sup>1</sup>:** The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted Hours of Operation. If a Non-Mechanized LSR is FOC'd on Saturday by the Resale Business, UNE or Complex Group, the interval from 6:00 PM Friday until 8:00 AM Saturday will be excluded. If an LSR is FOC'd on Sunday by the LCSC Resale Residence Group, the interval from 7:00 PM Saturday until 8:00 AM Sunday will be excluded. For LSRs FOC'd by the Resale Business, UNE and Complex Groups on Sunday, the interval from 6:00 PM Friday until 8:00 AM Sunday will be excluded.

#### Business Rules

**Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC.

**Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR which falls out for manual handling until appropriate service orders are issued by a BST service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC.

**Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.

**Non-Mechanized:** The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BST service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON.

**Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

#### Calculation

**Firm Order Confirmation Timeliness** =  $\Sigma[(\text{Date and Time of Firm Order Confirmation}) - (\text{Date and Time of Service Request Receipt})] / (\text{Number of Service Requests Confirmed in Reporting Period})$

**FOC Interval Distribution** =  $(\text{Service Requests Confirmed in Interval} / \text{Total Service Requests Confirmed in the Reporting Period}) \times 100$

#### Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State, Region
- Mechanized:
  - 0 - < 15 minutes
  - 15 - < 30 minutes
  - 30 - < 45 minutes
  - 45 - < 60 minutes
  - 60 - < 90 minutes
  - 90 - < 120 minutes

# BELLSOUTH OSS Testing

## Florida Interim Performance Metrics

- 120 - < 240 minutes
- 4 - < 8 hours
- 8 - < 12 hours
- 12 - < 16 hours
- 16 - < 20 hours
- 20 - < 24 hours
- 24 - < 48 hours
- > 48 hours
- Non-mechanized:
  - 0 - < 4 hours
  - 4 - < 8 hours
  - 8 - < 12 hours
  - 12 - < 16 hours
  - 16 - < 20 hours
  - 20 - < 24 hours
  - 24 - < 48 hours
  - > 48 hours
- Trunks:
  - 0 - 5 days
  - 6 - 8 days
  - 9 - 11 days
  - 12 - 14 days
  - 15 - 17 days
  - 18 - 20 days
  - > 20 days
- Average Interval in Days

### Level of Disaggregation

- Product Reporting Levels
  - Resale Residence
  - Resale Business
  - Resale Design (Special)
- UNE Design
- UNE Non-Design
- UNE Loop with and w/o NP
- Interconnection Trunks
  - < 10 Circuits/Lines
  - > 10 Circuits/Lines

### Data Retained

Relating to CLEC Experience	Relating to BST Performance
<ul style="list-style-type: none"><li>• Report month</li><li>• Interval for FOC</li><li>• Total number of LSRs</li><li>• State and Region</li><li>• Total Number of ASRs (Trunks)</li></ul>	

### Retail Analog/Benchmark

- Benchmark: Mechanized 95%  $\leq$  3 hours
- Non-Mechanized and Partially Mechanized 85%  $<$  36 hours
- Local Interconnection Trunks 95% within 10 days

# **BELLSOUTH OSS Testing**

## **Florida Interim Performance Metrics**

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**Note:** During Phase II, KPMG will conduct a special study of end-to-end timing of order confirmations (from initial receipt of the order by BST to the transmission of the confirmation to the ALEC) in order to assess whether the definition of timeliness used in this metric is appropriate. This study will determine the transit times between the ALEC interface and the BST legacy systems. Loop qualification and loop make-up queries are not automated functions for BST. Therefore, these are not included in this metric. However, KPMG will make a special study of the timing of these queries relative to BST Retail operations.

**O-7: Firm Order Confirmation Timeliness**

# BELLSOUTH OSS Testing

## Florida Interim Performance Metrics

### P-6: Coordinated Customer Conversions Interval

#### Definition

This report measures the average time it takes BST to disconnect an unbundled loop from the BST switch and cross connect it to a CLEC's equipment. This measurement applies to service orders with and without LNP, and where the CLEC has requested BST to provide a coordinated cutover.

#### Exclusions

- Any order canceled by the CLEC will be excluded from this measurement.
- Delays due to CLEC following disconnection of the unbundled loop
- Unbundled Loops where there is no existing subscriber loop and loops where coordination is not requested.

#### Business Rules

Where the service order includes LNP, the interval includes the total time for the cutover including the translation time to place the line back in service on the ported line. The interval is calculated for the entire cutover time for the service order and then divided by items worked in that time to give the average per item interval for each service order.

#### Calculation

$$\frac{\sum [(Completion Date and Time for Cross Connection of an Coordinated Unbundled Loop) - (Disconnection Date and Time of an Coordinated Unbundled Loop)]}{Total Number of Unbundled Loop with Coordinated Conversions (items) for the reporting period} \times 100.$$

#### Report Structure

- CLEC Specific
- CLEC Aggregate
- Reported in intervals  $\leq 5$  minutes;  $>5, \leq 15$  minutes;  $>15$  minutes, plus Overall Average interval.

#### Level of Disaggregation

- Unbundled Loops with INP (UNE Loop)
- Unbundled Loops with LNP (LNP)
- Geographic Scope
- State, Region, and further geographic disaggregation (MSA) as required by State Commission Order.

#### Data Retained

Relating to CLEC Experience	Relating to BST Experience
<ul style="list-style-type: none"><li>• Report Month</li><li>• CLEC Order Number</li><li>• Committed Due Date (DD)</li><li>• Service Type (CLASS_SVC_DESC)</li><li>• Cutover Start Time</li><li>• Cutover Completion time</li><li>• Portability start and completion times (NP orders)</li><li>• Total Conversions (Items)</li></ul> <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p> <ul style="list-style-type: none"><li>•</li></ul>	<ul style="list-style-type: none"><li>• No BST Analog Exists</li></ul>

#### Benchmark

- 95%  $\leq 15$  Minutes

# **BELLSOUTH OSS Testing**

## **Florida Interim Performance Metrics**

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### **CM-2: Average Delay Days for Change Management Notices**

#### **Definition**

Measures the average delay days of change management notices sent outside the time frame set forth in the Change Control Process.

#### **Exclusions**

None

#### **Business Rules**

This metric is designed to measure the percentage of average delay days for change management notices sent to the CLECs according to notification standards and time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

#### **Calculation**

$\Sigma [(Date\ Notice\ Sent - Date\ Notice\ Due) + (Total\ Number\ of\ Notices\ Sent)]$

#### **Report Structure**

BST Aggregate

#### **Level of Disaggregation**

Region

#### **Data Retained**

- Report Period
- Notice Date
- Release Date

#### **Retail Analog/Benchmark**

$90\% \leq 5\ Days$

CM-2: Average Delay Days for Change Management Notices

# **BELLSOUTH OSS Testing**

## **Florida Interim Performance Metrics**

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### **CM-4: Average Delay Days for Documentation**

#### **Definition**

Measures the average delay days of documentation sent outside the time frame set forth in the Change Control Process.

#### **Exclusions**

None

#### **Business Rules**

This metric is designed to measure the percent of average delay days for documentation sent to the CLECs according to notification standards and time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

#### **Calculation**

$\Sigma [(Date Documentation Provided - Date Documentation Due) + (Total Change Management Documents Sent)]$

#### **Report Structure**

BST Aggregate

#### **Level of Disaggregation**

Region

#### **Data Retained**

- Report Period
- Notice Date
- Release Date

#### **Retail Analog/Benchmark**

90%  $\leq$  5 Days

CM-4: Average Delay Days for Documentation

**OBSERVATION 77**  
BellSouth Florida OSS Testing Evaluation

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**Date:** May 18, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**BellSouth does not provide sequential telephone numbers as requested using the Telephone Number Availability Query (TNAQ). (TVV1)**

**Background:**

BellSouth pre-order transactions are performed using either the Telecommunications Access Gateway (TAG) or the Local Exchange Navigation System (LENS) interface. CLECs are able to request and reserve telephone numbers using the TNAQ as specified in the *BellSouth Pre-Order Business Rules, Issue 11.0*<sup>1</sup>. Furthermore, CLECs have the option to choose the type of telephone numbers requested using the applicable values for the TN Option field of the TNAQ form.

The TN options are required when submitting a TNAQ to BellSouth. TN Options include: Easy, Coin, Sequential, Ascending, Descending, Identical, None (i.e. Random)<sup>2</sup>.

KPMG Consulting could not obtain sequential telephone numbers using TNAQ.

**Question:**

If sequential numbers aren't available at a particular switch in a Central Office, what other option does BellSouth offer to CLECs?

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<sup>1</sup> *BellSouth Pre-Order Business Rules, Issue 11.0, April 2001*. This document can be found at the following URL: <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>

<sup>2</sup> See *BellSouth Pre-Order Business Rules, Issue 11.0, April 2001*, page 110.